

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, \*  
ROSALIE WEISFELD, AUSTIN \*  
JUSTICE COALITION, \*  
COALITION OF TEXANS WITH \*  
DISABILITIES, MOVE TEXAS \*  
CIVIC FUND, LEAGUE OF \*  
WOMEN VOTERS OF TEXAS, \*  
and AMERICAN GI FORUM OF \*  
TEXAS, INC., \*

Plaintiffs, \*

VS. \*

CIVIL ACTION NUMBER  
5:19-cv-0963

TEXAS SECRETARY OF \*  
STATE, TRUDY HANCOCK, IN \*  
HER OFFICIAL CAPACITY AS \*  
BRAZOS COUNTY ELECTIONS \*  
ADMINISTRATOR, AND PERLA \*  
LARA IN HER OFFICIAL \*  
CAPACITY AS CITY OF \*  
McALLEN, TEXAS \*  
SECRETARY, \*

Defendants. \*

Remote Oral Deposition of  
Austin Justice Coalition,

By and through their Designated Representative,

LARISSA RODIONOV

May 20, 2020

10:16 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

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[REDACTED]

Q. Has AJC had any prior dealings with the Texas Secretary of State's office?

A. No.

Q. How about Perla Lara, the McAllen city secretary?

A. No.

Q. And how about Trudy Hancock, the Brazos County election administrator?

A. No.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Q. Do you know if you ever -- if the Austin Justice Coalition ever assisted a voter to register to vote in a McAllen election?

MR. KALAR: Object to form.

BY MR. TAWIL:

Q. Let me limit that in time. Since 2017?

MR. KALAR: Same objection.

A. In McAllen, specifically for a McAllen city election?

BY MR. TAWIL:

Q. Any election in McAllen.

A. Again, I can't say for certain. I don't know where all the people have come from.

Q. Has anybody that voted by mail in an election in McAllen ever reached out to the Austin Justice Coalition for assistance as a result of any issue related to the ballot by mail that they cast?

1 MR. KALAR: Objection to form.

2 A. No.

3 THE WITNESS: Sorry.

4 A. No.

5 BY MR. TAWIL:

6 Q. Has the Austin Justice Coalition ever  
7 visited a detention facility in McAllen, Texas?

8 A. No.

9 Q. Has the Austin Justice Coalition ever  
10 visited a detention facility in Hidalgo County?

11 A. No.

12 Q. Do you know if the Austin Justice  
13 Coalition has ever had any interaction with Perla  
14 Lara, who is the city secretary of the City of  
15 McAllen, since 2017?

16 A. No.

17 Q. Has the Austin Justice Coalition  
18 communicated with the City of McAllen city  
19 secretary's office since 2017 regarding mail-in  
20 ballots?

21 A. No.

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

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ROSALIE WEISFELD, AUSTIN \*  
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DISABILITIES, MOVE TEXAS \*  
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LARA IN HER OFFICIAL \*  
CAPACITY AS CITY OF \*  
McALLEN, TEXAS \*  
SECRETARY, \*

Defendants. \*

Remote Oral Deposition of

Coalition of Texans with Disabilities,

By and through their Designated Representative,

CHASE BEARDEN

May 19, 2020

10:05 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

1 [REDACTED]

2 [REDACTED] [REDACTED]

3 [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED]

21 [REDACTED] [REDACTED]

22 [REDACTED]

23 Q. Okay. That's fine. All right. Has the

24 Coalition of Texans With Disabilities had any prior

25 dealings with Perla Lara or the McAllen city

1 secretary?

2 A. No.

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

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21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]



1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED] [REDACTED] [REDACTED]  
4 [REDACTED]  
5 [REDACTED] [REDACTED]  
6 [REDACTED]  
7 [REDACTED] [REDACTED]  
8 Q. Any of the individuals you mentioned in  
9 response to Mr. Magee's questions, do any of them  
10 vote in McAllen elections, McAllen city elections?

11 A. No.

12 [REDACTED] [REDACTED]  
13 [REDACTED] [REDACTED]  
14 [REDACTED] [REDACTED]  
15 [REDACTED]  
16 [REDACTED] [REDACTED] [REDACTED]  
17 [REDACTED]  
18 [REDACTED] [REDACTED]  
19 [REDACTED]  
20 [REDACTED] [REDACTED]  
21 [REDACTED] [REDACTED]  
22 [REDACTED]  
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24 [REDACTED] [REDACTED]  
25 [REDACTED]

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

|                            |   |                        |
|----------------------------|---|------------------------|
| DR. GEORGE RICHARDSON,     | ) |                        |
| ROSALIE WEISFELD, AUSTIN   | ) |                        |
| JUSTICE COALITION,         | ) |                        |
| COALITION OF TEXANS WITH   | ) |                        |
| DISABILITIES, MOVE TEXAS   | ) |                        |
| CIVIC FUND, LEAGUE OF      | ) |                        |
| WOMEN VOTERS OF TEXAS, and | ) |                        |
| AMERICAN GI FORUM OF       | ) |                        |
| TEXAS, INC.,               | ) |                        |
| Plaintiffs,                | ) |                        |
|                            | ) |                        |
| vs.                        | ) | CASE NO. 5:19-cv-00963 |
|                            | ) |                        |
| TEXAS SECRETARY OF STATE,  | ) |                        |
| TRUDY HANCOCK, IN HER      | ) |                        |
| OFFICIAL CAPACITY AS       | ) |                        |
| BRAZOS COUNTY ELECTIONS    | ) |                        |
| ADMINISTRATOR, AND PERLA   | ) |                        |
| LARA IN HER OFFICIAL       | ) |                        |
| CAPACITY AS CITY OF        | ) |                        |
| MCALLEN, TEXAS SECRETARY,  | ) |                        |
| Defendants.                | ) |                        |

ORAL AND VIDEO DEPOSITION

DR. GEORGE RICHARDSON

MAY 13, 2020

(REPORTED REMOTELY)

1 [REDACTED]

2 [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED]

11 [REDACTED] [REDACTED] [REDACTED]

12 [REDACTED] [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED]

19 [REDACTED] [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED]

22 [REDACTED] [REDACTED] [REDACTED]

23 Q. Have you had any prior dealings with Perla Lara

24 or the McAllen city secretary?

25 A. City of Bryan or College Station?

1 Q. So I was going to ask that one next, but I'm  
2 just -- I just want to cover all the defendants in this  
3 lawsuit. So Perla Lara is the City of McAllen, Texas,  
4 secretary. And so --

5 A. Oh.

6 Q. -- I was wondering if you had familiarity with  
7 her or with that office.

8 A. Okay. No. No.

9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
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16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 Q. (BY MR. TAWIL) Dr. Richardson, my name is  
23 Isaac Tawil. I'm an attorney representing Perla Lara in  
24 this lawsuit. You don't have any complaints about Perla  
25 Lara or the City of McAllen, do you?

1 A. Who are you?

2 Q. I'm an attorney representing the City of  
3 McAllen --

4 A. Okay.

5 Q. -- and Perla Lara, who is a defendant in this  
6 lawsuit. You don't have any complains about Perla Lara,  
7 do you --

8 MR. MIRZA: Objection.

9 A. No.

10 Q. (BY MR. TAWIL) -- as it relates to your --  
11 your ballot?

12 MR. MIRZA: Objection.

13 Go ahead. You can answer.

14 A. I don't think so. No.

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

|                            |   |                        |
|----------------------------|---|------------------------|
| DR. GEORGE RICHARDSON,     | ) |                        |
| ROSALIE WEISFELD, AUSTIN   | ) |                        |
| JUSTICE COALITION,         | ) |                        |
| COALITION OF TEXANS WITH   | ) |                        |
| DISABILITIES, MOVE TEXAS   | ) |                        |
| CIVIC FUND, LEAGUE OF      | ) |                        |
| WOMEN VOTERS OF TEXAS, and | ) |                        |
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| Plaintiffs,                | ) |                        |
|                            | ) |                        |
| vs.                        | ) | CASE NO. 5:19-cv-00963 |
|                            | ) |                        |
| TEXAS SECRETARY OF STATE,  | ) |                        |
| TRUDY HANCOCK, IN HER      | ) |                        |
| OFFICIAL CAPACITY AS       | ) |                        |
| BRAZOS COUNTY ELECTIONS    | ) |                        |
| ADMINISTRATOR, AND PERLA   | ) |                        |
| LARA IN HER OFFICIAL       | ) |                        |
| CAPACITY AS CITY OF        | ) |                        |
| MCALLEN, TEXAS SECRETARY,  | ) |                        |
| Defendants.                | ) |                        |

ORAL AND VIDEO DEPOSITION

ROSALIE WEISFELD

MAY 13, 2020

(REPORTED REMOTELY)

1 [REDACTED]  
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14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]

21 Q. And why didn't you send a copy of this e-mail  
22 to anyone at the City of McAllen Secretary's Office?

23 A. The only thing I can remember is that after I  
24 became a client of the Texas Civil Rights Project they  
25 said they would take care of -- they -- they would --



1 they would represent me and communicate with those --  
2 they would communicate as necessary with -- regarding  
3 the case, regarding what happened to me.

4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
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24 [REDACTED]  
25 [REDACTED]

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ROSALIE WEISFELD, AUSTIN \*  
JUSTICE COALITION, \*  
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LARA IN HER OFFICIAL \*  
CAPACITY AS CITY OF \*  
McALLEN, TEXAS \*  
SECRETARY, \*

Defendants. \*

Remote Oral Deposition of

League of Women Voters of Texas,

By and through their Designated Representative,

GRACE CHIMENE

May 18, 2020

10:08 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

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[REDACTED]

Q. And how about -- to your knowledge, has the League of Women Voters of Texas had any prior dealings with the City of McAllen's secretary?

A. No.

Q. What about the --

A. No.

[REDACTED]

IN THE UNITED STATES DISTRICT COURT  
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ROSALIE WEISFELD, AUSTIN \*  
JUSTICE COALITION, \*  
COALITION OF TEXANS WITH \*  
DISABILITIES, MOVE TEXAS \*  
CIVIC FUND, LEAGUE OF \*  
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BRAZOS COUNTY ELECTIONS \*  
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CAPACITY AS CITY OF \*  
McALLEN, TEXAS \*  
SECRETARY, \*

Defendants. \*

Remote Oral Deposition of

MOVE Texas Civic Fund,

By and through their Designated Representative,

HILLIARD DREW GALLOWAY

May 22, 2020

10:02 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

1 [REDACTED] [REDACTED]  
2 [REDACTED] [REDACTED]  
3 [REDACTED]  
4 [REDACTED] [REDACTED]  
5 [REDACTED]  
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16 [REDACTED] [REDACTED]  
17 [REDACTED] [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]

22 Q. Has the -- has MOVE Texas Civic Fund had  
23 any prior dealings with Perla Lara or the McAllen  
24 city secretary?

25 A. No, not to my knowledge.

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[REDACTED]

[REDACTED]

[REDACTED]

Q. Do you have volunteers at Hidalgo County?

I know you said there's not a physical presence as  
in an office, but do you send volunteers down on an  
occasional basis?

A. To my knowledge, we have not -- we do not  
volunteer in Hidalgo County at this time.

Q. Okay. Has MOVE Civic Fund had any  
contact or communication with Perla Lara in her  
official capacity as the McAllen city secretary?

A. Not to my knowledge.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]